



**Air Quality**  
**PERMIT TO CONSTRUCT**  
**State of Idaho**  
**Department of Environmental Quality**

**PERMIT No.:** P-2007.0177

**FACILITY ID No.:** 005-00004

**AQCR:** 61

**CLASS:** A

**SIC:** 3241

**ZONE:** 12

**UTM COORDINATE (km):** 397.6, 4738.6

**1. PERMITTEE**

Ash Grove Cement Company

**2. PROJECT**

Clinker Unloading Operation

**3. MAILING ADDRESS**

230 Cement Road

**CITY**

Inkom

**STATE**

ID

**ZIP**

83245

**4. FACILITY CONTACT**

Kelly Packard

**TITLE**

Plant Engineer/Environmental Manager

**TELEPHONE**

(208) 775-3351 ext. 36

**5. RESPONSIBLE OFFICIAL**

Ron Smith

**TITLE**

Plant Manager

**TELEPHONE**

(208) 775-3351 ext. 12

**6. EXACT PLANT LOCATION**

230 Cement Road, Inkom

**COUNTY**

Bannock

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Portland Cement Production

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

**KEN HANNA, PERMIT WRITER**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE MODIFIED/REVISED:**

DRAFT

**DATE ISSUED:**

November 10, 2005

**MIKE SIMON, STATIONARY SOURCE PROGRAM**  
**MANAGER**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

## Table of Contents

|  |   |
|--|---|
| ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE ..... | 3 |
| 1. PERMIT TO CONSTRUCT SCOPE.....                | 4 |
| 2. EMISSIONS UNIT NAME .....                     | 5 |
| 3. PERMIT TO CONSTRUCT GENERAL PROVISIONS .....  | 6 |

## **Acronyms, Units, and Chemical Nomenclature**

|                  |  |
|------------------|--|
| AFS              | AIRS Facility Subsystem  |
| AIRS             | Aerometric Information Retrieval System  |
| AQCR             | Air Quality Control Region   |
| Btu              | British thermal unit   |
| CFR              | Code of Federal Regulations  |
| DEQ              | Department of Environmental Quality  |
| dscf             | dry standard cubic feet  |
| EPA              | U.S. Environmental Protection Agency   |
| gr               | grain (1 lb = 7,000 grains)  |
| IDAPA            | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| km               | kilometer  |
| lb/hr            | pound per hour   |
| m                | meter(s)   |
| MACT             | Maximum Achievable Control Technology  |
| NESHAP           | Nation Emission Standards for Hazardous Air Pollutants   |
| NSPS             | New Source Performance Standards   |
| PM               | particulate matter   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| PTC              | permit to construct  |
| SIC              | Standard Industrial Classification   |
| T/yr             | tons per year  |
| UTM              | Universal Transverse Mercator  |

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0177****Permittee:** Ash Grove Cement Company**Location:** Inkom, Idaho**Facility ID No.** 005-00004**1. PERMIT TO CONSTRUCT SCOPE*****Purpose***

- 1.1 The purpose of this permit is: 1) to remove the limit on the quantity of imported clinker that can be unloaded annually; and 2) to install a conveyor to allow imported clinker to be diverted to the clinker storage shed rather than being limited to only the clinker silos. This will allow for increased operational flexibility at the facility to: 1) make the clinker on-site; 2) import the clinker from off-site; or 3) some combination of the two.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located on the right hand margin directly under the permit condition.
- 1.3 This PTC replaces PTC No. P-050314, issued on November 10, 2005, the terms and conditions of which shall no longer apply.

***Regulated Sources***

- 1.4 Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

| <b>Permit Section</b> | <b>Source Codes</b> | <b>Source Description</b>                     | <b>Emissions Control(s)</b>   |
|-----------------------|---------------------|---|---|
| 2                     | F49d                | Truck/railcar to hopper                       | Hopper pit  |
| 2                     | F49e                | Hopper to conveyor                            | Cover over conveyor, partial cover at transfer point, partial control by Baghouse No. 2 |
| 2                     | F49f                | Conveyor to No. 2 elevator, 100 tons per hour | Baghouse No. 2  |
| 2                     | F61, F62, F63       | Drag Conveyor to storage silos                | Baghouse No. 2  |
| 2                     | F56a, F57           | Conveyor to clinker shed                      | Baghouse No. 2, partial enclosure   |

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0177**

|                   |                          |                                  |
|-------------------|--------------------------|----------------------------------|
| <b>Permittee:</b> | Ash Grove Cement Company | <b>Facility ID No.</b> 005-00004 |
| <b>Location:</b>  | Inkom, Idaho             |                                  |

**2. CLINKER UNLOADING****2.1 Process Description**

Clinker is imported from other plants by truck and railcar to the facility and belly-dumped into an enclosed below-grade hopper. A vibratory feeder moves the clinker from the hopper to a covered conveyor belt. The conveyor belt carries the clinker to a clinker elevator. Clinker discharged from the elevator can be diverted to either a drag conveyor or a belt conveyor. The drag conveyor discharges clinker to one of three storage silos. The belt conveyor transfers the clinker to another conveyor which discharges to the clinker stacker. The clinker stacker deposits material into the clinker shed which is an outdoor pile that is mostly enclosed with the exception of a portion of the north end.

**2.2 Emissions Control Description****Table 2.1 [EMISSIONS UNIT NAME] DESCRIPTION**

| <b>Emissions Unit(s) / Process(es)</b>        | <b>Emissions Control Device</b>   | <b>Emissions Point (Source Codes)</b> |
|---|---|---------------------------------------|
| Truck/railcar to hopper                       | Hopper pit  | F49d                                  |
| Hopper to conveyor                            | Cover over conveyor, partial cover at transfer point, partial control by Baghouse No. 2 | F49e                                  |
| Conveyor to No. 2 elevator, 100 tons per hour | Baghouse No. 2  | F49f                                  |
| Drag Conveyor to storage silos                | Baghouse No. 2  | F61, F62, F63                         |
| Conveyor to clinker shed                      | Baghouse No. 2, partial enclosure   | F56a, F57                             |

***Operating Requirements*****2.3 Clinker Unloading System, Transfer Point Opacity Limit - NSPS**

In accordance with 40 CFR 60.62(c), the permittee shall not cause to be discharged into the atmosphere from any affected facility any gases which exhibit 10% opacity, or greater. Affected facilities that are subject to this requirement include the following sources: clinker unloading system. Opacity shall be determined using the procedures specified in 40 CFR 60.64(b) and IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho).

[draft, date]

***Monitoring and Recordkeeping Requirements*****2.4 Clinker Unloading System Performance Test - NSPS**

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Administrator under section 114 of the Act, the permittee shall conduct a performance test as required by 40 CFR 60.8, 60.62(c) and 60.64, and in accordance with General Provision 6 of this permit and IDAPA 16.01.01.157, to demonstrate compliance with Permit Condition 2.3 of this permit. The affected facilities that require an initial test within 60/180 days include the following: the conveyor belt installed to transfer clinker from elevator #2 to the stacking belt which conveys clinker to a stacking pipe in the clinker storage shed (source codes F56a and F57). The affected facilities for which the Administrator may require a performance test under section 114 of the Act include the following: clinker unloading system.

[draft, date]

| AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0177 |                          |                           |
|---|--------------------------|---------------------------|
| Permittee:  | Ash Grove Cement Company | Facility ID No. 005-00004 |
| Location:   | Inkom, Idaho             |                           |

### 3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

#### ***General Compliance***

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.  
[Idaho Code §39-101, et seq.]
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.  
[IDAPA 58.01.01.211, 5/1/94]
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.  
[IDAPA 58.01.01.212.01, 5/1/94]

#### ***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

#### ***Construction and Operation Notification***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

| <b>AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0177</b> |                          |                                  |
|--|--------------------------|----------------------------------|
| <b>Permittee:</b>  | Ash Grove Cement Company | <b>Facility ID No. 005-00004</b> |
| <b>Location:</b>   | Inkom, Idaho             |                                  |

- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

**[IDAPA 58.01.01.211, 5/1/94]**

### ***Performance Testing***

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

**[IDAPA 58.01.01.157, 4/5/00]**

### ***Monitoring and Recordkeeping***

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

**[IDAPA 58.01.01.211, 5/1/94]**

### ***Excess Emissions***

| AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0177 |                          |                           |
|---|--------------------------|---------------------------|
| Permittee:  | Ash Grove Cement Company | Facility ID No. 005-00004 |
| Location:   | Inkom, Idaho             |                           |

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

### ***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

### ***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

### ***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

### ***Transferability***

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

### ***Severability***

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.